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ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 12/18/19

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December 17, 2019

VIA HAND DELIVERY

MEMO ENDORSED

P2

Honorable Richard M. Berman, U.S.D.J.  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Türkiye Halk Bankasi A.Ş., a/k/a “Halkbank”  
U.S. District Court for the Southern District of New York  
No. 1:15-cr-00867-RMB**

Dear Judge Berman:

We submit this letter, along with the attached appendices, to request this Court stay further proceedings on behalf of Türkiye Halk Bankasi A.Ş. (“Halkbank” or the “Bank”). On December 17, 2019, the Bank filed a petition for mandamus to the Second Circuit, seeking an order directing this Court to allow Halkbank to enter a special appearance. The petition is attached to this letter as Attachment B. The Bank respectfully requests that this Court stay all proceedings, including the show cause briefing, hearing, and the subsequent arraignment, pending a decision by the Second Circuit on the Bank’s mandamus petition. As set forth in the attached Memorandum of Law (Attachment A), a stay is required to protect the Bank from irreparable harm while the petition is pending.

\* \* \* \*

December 17, 2019

Page 2

For the foregoing reasons and the reasons set forth in Halkbank's Memorandum of Law, this Court should grant Halkbank's request to stay proceedings pending the Second Circuit's ruling on the Bank's mandamus petition.

Respectfully,



Andrew C. Hruska

By E-Mail and U.S. Mail:

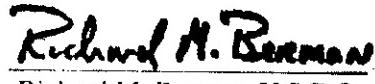
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By Hand:

Honorable Richard M. Berman  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
Courtroom 17B  
500 Pearl St.  
New York, New York 10007

The Govt is requested to respond  
to Halkbank's motion to stay  
further proceedings by S.P.M. on  
12/19/19. Govt may submit a  
written brief with authorities.

SO ORDERED:  
Date: 12/18/19

  
Richard M. Berman, U.S.D.J.